

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In Re:

Justice Watts

Case No. 19-28370JNP

Judge:

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following
(choose one):

1. _____ Motion for Relief from the Automatic Stay filed by _____, creditor. A hearing has been scheduled for _____, at _____ a.m.

OR

_____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for _____ at _____ a.m.

OR

 X Certification of Default filed by Freedom Mortgage Corporation, creditor.
I am requesting that a hearing be scheduled on this matter.

OR

_____ Certification of Default filed by Standing Chapter 13 Trustee.
I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

X Other: I made a payment of \$3,300 on February 24, 2021 which is not reflected on the payment history. In addition, I made a payment of \$3,218.66 which should be received and posted by 3/16/2021. I will cure the remaining post-petition mortgage arrears by March 31, 2021 and resume regular mortgage payments as of April 2021. I respectfully request that the movant's motion be denied so that I may cure the arrears and continue with my bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 3/11/2021

/s/ Justice Watts
Justice Watts, Debtor